## Federal Defenders OF NEW YORK, INC.

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July 8, 2020

By ECF

The Honorable Ronnie Abrams **United States District Court** Southern District of New York 40 Foley Square New York, New York 10007

Re:

United States v. Anthony Perez-Batista

20 Cr. 151 (RA)

Dear Judge Abrams:

Application granted. The sentence is adjourned to August 14, 2020 at 11:00 a.m.

SO ORDERED.

Ronnie Abrams, U.S.D.J.

July 8, 2020

I write on behalf of my client Mr. Anthony Perez-Batista to object to the government's position that the Coronavirus Aid, Relief, and Economic Security ("CARES") Act requires that Mr. Perez-Batista's sentencing be delayed. It is clearly within the Court's purview to proceed with sentencing remotely, so long as Mr. Perez-Batista makes a knowing and voluntary waiver of his right to proceed in person.

Nevertheless, because the defense requires additional time to prepare for sentencing with Mr. Perez-Batista and to finalize our submission, I am constrained to respectfully request an adjournment of the sentencing hearing currently set in this matter for Friday, July 17, 2020 at 11:30 A.M. for approximately thirty days.

Thank you for considering this request.

Respectfully submitted,

Christopher A. Flood Assistant Federal Defender

(212) 417-8734

Elinor Tarlow, Esq. CC:

Assistant United States Attorney